

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-10584 (CTG)
)

) (Jointly Administered)
)

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON
AUGUST 11, 2022 AT 2:00 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

**This remote hearing will be conducted entirely over Zoom and requires all
participants to register in advance. Please register by
August 10, 2022 at 4:00 p.m.**

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing

<https://debuscourts.zoomgov.com/meeting/register/vJltdO2opzsvHSf4J5dkNHhb-TxOyWfdCL8>

**After registering your appearance by Zoom, you will receive a confirmation
email containing information about joining the hearing.**

CONTESTED MATTERS GOING FORWARD:

1. SEALED Motion of Debtors for Entry of an Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief (Filed 7/20/2022) [D.I. 160].

Response Deadline: August 1, 2022 at 2:00 p.m. (Prevailing Eastern Time).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

² **Amended items are noted in bold.**

Responses Received

- A. Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Approving the Debtors' Key Employee Incentive and Key Employee Retention Programs (Filed 8/1/2022) [D.I. [248](#)].

Related Documents

- A. SEALED Declaration of Tanya Meerovich in Support of Debtors' Motion of Debtors for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [161](#)].
- B. SEALED Declaration of Dewey Imhoff in Support of Motion of Debtors for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [162](#)].
- C. REDACTED Motion of Debtors for Entry of an Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [163](#)].
- D. REDACTED Declaration of Tanya Meerovich in Support of Debtors' Motion of Debtors for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [164](#)].
- E. REDACTED Declaration of Dewey Imhoff in Support of Motion of Debtors for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [165](#)].
- F. Motion to Shorten Notice Period With Respect to Debtors' Motion for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [166](#)].
- G. Objection of the United States Trustee to Motion to Shorten Notice (Filed 7/20/2022) [D.I. [169](#)].
- H. Order Granting Motion to Shorten Notice Period with Respect to Debtors' Motion for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief (Signed 7/20/2022) [D.I. [178](#)].

- I. Notice of Hearing on Debtor's Motion for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Employee Retention Program, and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [179](#)].
- J. Debtors' Witness and Exhibit List for Hearing on August 2, 2022 at 10:00 a.m. (Filed 7/31/2022) [D.I. [245](#)].
- K. Supplemental Declaration of Tanya Meerovich in Support of Debtors' Motion of Debtors for Entry of Order (I) Approving Key Employee Incentive Program, (II) Key Retention Employee Program and (III) Granting Related Relief (Filed 7/20/2022) [D.I. [255](#)].
- L. Order Approving Key Employee Retention Plan (Signed 8/4/2022) [D.I. [290](#)].

Status: The Court has entered an order approving the Debtors' key employee retention plan. This matter is going forward solely in connection with the Debtors' proposed key employee incentive plan.

- 2. Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Filed 8/5/2022) [D.I. [298](#)].

Response Deadline: August 9, 2022 at 12:00 p.m. (Prevailing Eastern Time) [Extended by agreement to August 10, 2022 at 12:00 noon for the Debtors].

Responses Received

- A. Limited Objection and Reservation of Rights of the Federal Home Loan Mortgage Corporation to Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Filed 8/9/2022) [D.I. [306](#)].
- B. **Informal comments from the Debtors.**

Related Documents

- A. Declaration of Jeffrey Neufeld in Support of Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Filed 8/5/2022) [D.I. [299](#)]
- B. Motion to Shorten Notice Period With Respect to Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Filed 8/5/2022) [D.I. [300](#)].
- C. Order Shortening the Notice and Objection Periods with Respect to Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Signed 8/8/2022) [D.I. [302](#)].
- D. Notice of Hearing (Filed 8/8/2022) [D.I. [304](#)].

E. Certification of Counsel Regarding Flagstar Bank, FSB's Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) (Filed 8/5/2022) [D.I. [315](#)]

Status: The Movant has filed a revised proposed form of order under Certification of Counsel. No hearing is necessary unless the Court has questions.

Dated: August 11, 2022

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